



U.S. Department of Justice

United States Attorney
Southern District of New York

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The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 28, 2006

DATE FILED: 3/7/06

By Facsimile

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007

Re: *United States v. William Henriquez*,
05 Cr. 185 (AKH)

Dear Judge Hellerstein:

The Government respectfully submits this letter regarding the scheduling of defense motions in the above-referenced matter.

Pursuant to the Court's instructions at the February 14, 2006 status conference, Government counsel conferred with defense counsel to determine whether or not the parties would be able to reach an agreement regarding the admissibility of certain statements made by the defendant during a proffer at the United States Attorney's Office. Those discussions have not resulted in any agreement among the parties. Accordingly, insofar as the Government intends to offer evidence of the defendant's statements, in accordance with the terms of the Proffer Agreement entered into by the parties, the Government respectfully submits that the Court should schedule a time for the defendant to make his motion and for the parties to brief the issue.

Respectfully Submitted,

MICHAEL J. GARCIA
United States AttorneyBy: 

Harry Sandick / Daniel L. Stein
Assistant United States Attorneys
(212) 637-2340 / 2407

cc: Joel Stein, Esq.
Attorney for William Henriquez

*The parties shall prepare
a schedule for this court
to no order.
3-3-06
Alvin K. Hellerstein*